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January 4, 2024

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Vera M. Scanlon, U.S.M.J.
225 Cadman Plaza East
Courtroom 13A South
Brooklyn, NY 11201-1804

Re: Sanchez v. EZ Parking Corp., et al.
Case No.: 1:23-cv-4052 (AMD) (VMS)

Dear Judge Scanlon:

This office represents the Defendant EK Premier Services LLC (“EK”) in the above-referenced case. See ECF Docket Entries [12](#) and [18](#). Defendant EK writes, with Plaintiff’s consent, to respectfully request a fifty-eight (58) day extension of time from November 15, 2023 to respond to the Plaintiff’s amended complaint¹ in this case.

Pursuant to ¶ II(b) of this Court’s Individual Practice Rules, Defendant EK respectfully submits that:

- (i) the original date to respond to the amended complaint was November 15, 2023;²
- (ii) there have been no previous requests for an extension of time to respond to Plaintiff’s amended complaint;
- (iii) the Plaintiff consents to the requested extension of time;
- (iv) the reason for the requested extension of time is because it came to Defendant EK’s attention that no response had been filed to the amended complaint due to inadvertence;
- (v) the requested extension would move the deadline to Friday, January 12, 2024; and
- (vi) Defendant EK is not aware of any other scheduled dates the requested extension would affect.

¹ See ECF Docket Entry [14](#).

² Plaintiff’s amended complaint was filed on November 1, 2023. Pursuant to Rule 15, Defendant EK’s answer was due fourteen (14) days thereafter. See Fed. R. Civ. P. 15(a)(3).

Accordingly, Defendant EK respectfully submits that there is good cause for the requested extension of time. See Fed. R. Civ. P. 6(b)(1)(A).

Defendant EK thanks this Court for its time, attention and anticipated courtesies in this case.

Dated: Lake Success, New York
January 4, 2024

Respectfully submitted,

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